

# **EXHIBIT 42**

Cause No. 2023-38238

Zurich American Insurance Company, HCC § In the District Court of  
International Insurance Company PLC, §  
Philadelphia Indemnity Insurance §  
Company, Everest Reinsurance Company, § Harris County, Texas  
Plaintiffs,  
v. §  
Apache Corporation, § 281<sup>st</sup> Judicial District  
Defendant. §

Apache's Injunction Hearing Exhibit List

Apache reserves the right to supplement this exhibit list before and during the proceedings and to offer materials not listed here based on arguments, offering, exhibits, and testimony from the Insurers. Apache reserves the right to use any exhibits on the Insured's list and has tried to avoid listing duplicates here.

DX #	Date	Description	Offered	Admitted
1	06/02/2022	Letter from US Department of Interior to Apache Corporation and others re Decommissioning Order for Lease		
2	08/30/2018	Payment Bond between Fieldwood Energy LLC, Everest Reinsurance Company, and Apache Corporation		
3	09/27/2018	Payment Bond between Fieldwood Energy LLC, Philadelphia Indemnity Insurance Company, and Apache Corporation		
4	09/30/2013	Deutsche Bank AG Standby Letter of Credit No. DBS-20280		
5	08/07/2021	Subrogation, Subordination, and Payment Agreement		
6		Department of the Interior BSEE webpage re Decommissioning		
7		Department of the Interior BSEE webpage re Decommissioning		
8	12/11/2018	BSEE Notice to Lessees and Operators re Idle Iron Decommissioning Guidance for Wells and Platforms		
9	07/18/2013	Purchase and Sale Agreement between Apache Corporation, Fieldwood Energy and GOM Shelf		
10	06/02/2021	Excerpts from the deposition of Jon Graham in <i>In re: Fieldwood Energy, LLC</i> , Case No. 20-33948		
11	04/11/2018	Fifth Amendment to Decommissioning Agreement		
12	11/09/2015	Payment Bonds between Fieldwood Energy LLC, Zurich American Insurance Company, and Deutsche Bank AG New York Branch		

DX #	Date	Description	Offered	Admitted
13	06/25/2021	Findings Of Fact, Conclusions Of Law, And Order (I) Confirming Eighth Amended Joint Chapter 11 Plan Of Fieldwood Energy LLC And Its Affiliated Debtors And (II) Granting Related Relief in <i>In re: Fieldwood Energy</i> , Case No. 20-33948		
14	07/06/2022	Letter from Duane Brescia to Jon Graham re Apache Sureties' Evaluation of the GOM Shelf/Apache Production of Documents		
15	08/00/2021	Letter Agreement Related to GOM Shelf LLC Merger with Fieldwood Energy I signed by Sureties		
16		NOT USED		
17		NOT USED		
18		NOT USED		
19	09/08/2021	Letter from GOM Shelf LLC to US Department of Interior, BSEE and BOEM re further notice of default		
20	02/22/2022	Letter from GOM Shelf LLC to US Department of Interior, BSEE and BOEM re further notice of post-Effective Date default		
21	04/05/2022	Letter from GOM Shelf LLC to US Department of Interior, BSEE and BOEM re further notice of post-Effective Date default		
22	09/08/2021	Email from Peter Czerniakowski to Gregory Aumann re renewal of Philadelphia Indemnity Insurance Company bond		
23	08/02/2022	Email from Gregory Aumann to Rose Olmos re renewal of Philadelphia Indemnity Insurance Company bond		
24	07/19/2022	Email from Tony Romano to Rose Olmos re renewal of the Everest Reinsurance Company bond		
25	08/14/2022	Bi-weekly Status Report for South Pass Block #89-B Platform (R&M Repair Work)		
26	09/11/2022	Bi-weekly Status Report for South Pass Block #89-B Platform (R&M Repair Work)		
27	06/06/2022	Letter from Apache Corporation to GOM Shelf LLC re Seller Notice of Required Decommissioning under Decommissioning Agreement		
28	03/22/2022	Email from Michelle Hsiao to Rose Olmos re renewal of Deutsche Bank SBLC #839BGC1600430		
29	03/28/2023	Email from Konni Geppert to James Snelling re renewal of Deutsche Bank SBLC #839BGC1600430		
30	04/17/2023	Email from Abigail Noebels to Duane Brescia and others re courtesy production of documents		
31	04/19/2023	Email with attachments from Abigail Noebels to Duane Brescia and others re supplemental production of documents		
32	09/30/2013	Decommissioning Agreement among Apache entities, Fieldwood Energy LLC and GOM Shelf LLC		
33	04/14/2021	Dkt 1270-2 Exhibit O – FWE I Projections, Amended Disclosure Statement		

DX #	Date	Description	Offered	Admitted
34	08/27/2021	Limited Liability Company Agreement of Fieldwood Energy I LLC		
35	08/05/2021	Letter from Fieldwood Energy LLC to Deutsche Bank AG New York Branch re Letter agreement related to GOM Shelf LLC merger with Fieldwood Energy I		
36	03/21/2023	Letter from Apache Corporation to Wilmington Trust re Secondary Beneficiary Demand for Reimbursement from Trust A Liquid Trust Asset (APA-SSPA 00163904-00163913)		
37	03/09/2023	Letter from Jon Graham to Duane Brescia re Apache Sureties' Request for Information from GOM Shelf LLC		
38	05/13/2021	Deposition of Michael Dane		
39	06/02/2021	Deposition of Jon Graham		
40		February 2022 through July 2023 Demand letters to GOM Shelf for Reimbursable amounts		
41	09/08/2020	Email from Duane Brescia to Robin Russell re Fieldwood-Zurich/HCCI bonds		
42	06/29/2023	Gulf of Mexico Decommissioning Order Map		
43	03/24/2021	Dkt 1156 Transcript re Status Conference/Disclosure Statement		
44	06/21/2021	Dkt 1763 Confirmation Hearing Day One Transcript		
45	06/22/2021	Dkt 1764 Confirmation Hearing Day Two Transcript		
46	06/23/2021	Dkt 1773 Confirmation Hearing Day Three Transcript		
47	06/24/2021	Dkt 1789 Amended Confirmation Hearing Day Four Transcript		
48	06/25/2021	Dkt 1788 Confirmation Hearing Day Five Transcript		
49	05/24/2021	Expert Report of Lily W. Cheung, P.E., NSAI re FWEI Production Forecasts and Abandonment		
50	08/08/2022	Letter from Geoffrey Harrison to Duane Brescia re Response to Clark Hill's July 6, 2022 letter to GOM Shelf LLC with attachment		
51		Chart re Decommission order dates and lease termination		
52	04/16/2021	Letter from Darren Gryzb to Robin Russell re Enervest Reinsurance Company Bond No. ES00001441		
100	04/24/2019	Department of the Interior Decommissioning Order for Lease OCS-G 25933 East Cameron Block 37		
101	03/07/2023	Department of the Interior Amendment to Decommissioning Order for Lease OCS-G01030 Ship Shoal Block 249		
102	09/29/2021	Department of the Interior Decommissioning Order for Lease OCS-G 32267 Chandeleur Block 42		
103	09/29/2021	Department of the Interior Decommissioning Order for Lease OCS-G 17199 High Island Block A545		

DX #	Date	Description	Offered	Admitted
104	09/30/2021	Department of the Interior Decommissioning Order for Lease OCS-G 04234 South Pelto Block 1		
105	09/30/2021	Department of the Interior Decommissioning Order for Lease OCS-G 05953 North Padre Island Block 969		
106	09/30/2021	Department of the Interior Decommissioning Order for Lease OCS-G 05954 North Padre Island Block 976		
107	10/01/2021	Department of the Interior Decommissioning Order for Lease OCS-G 07827 Main Pass Block 259		
108	10/01/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02924 South Pelto Block 9		
109	10/01/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02925 South Pelto Block 10		
110	07/03/2023	Department of the Interior Decommissioning Order for Lease OCS-G 14456 South Marsh Island Block 280		
111	10/07/2021	Department of the Interior Decommissioning Order for Lease OCS-G 01181 South Marsh Island Block 10		
112	10/12/2021	Department of the Interior Decommissioning Order for Lease OCS-G 22679 Eugene Island Block 312		
113	10/12/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02317 Eugene Island Block 333		
114	10/12/2021	Department of the Interior Decommissioning Order for Lease OCS-G 15263 Eugene Island Block 334		
115	10/12/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02589 South Marsh Island Block 137		
116	10/12/2021	Department of the Interior Decommissioning Order for Lease OCS-G 10883 West Delta Block 128		
117	10/19/2021	Department of the Interior Decommissioning Order for Lease OCS-G 21096 Vermillion Block 326		
118	10/21/2021	Department of the Interior Decommissioning Order for Lease OCS-G 03410 Eugene Island Block 352		
119	10/29/2021	Department of the Interior Decommissioning Order for Lease OCS-G 13055 Viosca Knoll Block 694		
120	11/01/2021	Department of the Interior Decommissioning Order for Lease OCS-G 03328 Vermillion Block 261		
121	11/01/2021	Department of the Interior Decommissioning Order for Lease OCS-G 00247 West Cameron Block 102		
122	11/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 07799 South Pass Block 87		
123	11/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 10894 South Pass Block 88		
124	11/10/2021	Department of the Interior Decommissioning Order for Lease OCS-G 11383 High Island Block A442		
125	11/16/2021	Department of the Interior Decommissioning Order for Lease OCS-G 14576 Main Pass Block 91		
126	07/07/2023	Department of the Interior Decommissioning Order for Lease OCS-G 01614 South Pass Block 70		
127	11/19/2021	Department of the Interior Decommissioning Order for Lease OCS-G 13563 West Cameron Block 269		

DX #	Date	Description	Offered	Admitted
128	12/08/2021	Department of the Interior Decommissioning Order for Lease OCS-G 12940 Ship Shoal Block 126		
129	12/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02161 Grand Isle Block 76		
130	12/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 01208 South Marsh Island Block 76		
131	12/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 02588 South Marsh Island Block 136		
132	12/09/2021	Department of the Interior Decommissioning Order for Lease OCS-G 00244 West Cameron Block 71		
133	12/10/2021	Department of the Interior Decommissioning Order for Lease OCS-G 04481 Main Pass Blocks 77 and 78		
134	12/10/2021	Department of the Interior Decommissioning Order for Lease OCS-G 00071 South Pelto Block 11		
135	12/10/2021	Department of the Interior Decommissioning Order for Lease OCS-G 01198 South Marsh Island Block 66		
136	01/12/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00974 East Cameron Block 278		
137	01/13/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02110 Eugene Island Block 307		
138	01/13/2022	Department of the Interior Decommissioning Order for Lease OCS-G 15740 Galveston Block 151		
139	01/13/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02279 South Marsh Island Block 106		
140	01/19/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02282 South Marsh Island Block 132		
141	01/19/2022	Department of the Interior Decommissioning Order for Lease OCS-G 16325 South Marsh Island Block 150		
142	01/19/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05051 South Pass Block 75		
143	01/24/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02917 Ship Shoal Block 68		
144	01/24/2022	Department of the Interior Decommissioning Order for Lease OCS-G 10775 Ship Shoal Block 190		
145	07/07/2023	Department of the Interior Decommissioning Order for Lease OCS-G 00840 West Delta Block 103		
146	02/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00049 Eugene Island Block 119		
147	02/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00050 Eugene Island Block 120		
148	02/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00051 Eugene Island Block 125		
149	02/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00052 Eugene Island Block 126		
150	02/18/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00972 East Cameron Block 265		
151	02/23/2022	Department of the Interior Decommissioning Order for Lease OCS-G 07898 Viosca Knoll Blocks 692 and 693		

DX #	Date	Description	Offered	Admitted
152	03/09/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02319 Eugene Island Block 342		
153	03/22/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01609 South Pass Block 61		
154	04/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02392 High Island Block A572		
155	04/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02721 High Island Block A595		
156	04/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02722 High Island Block A596		
157	04/27/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02393 High Island Block A573		
158	05/12/2022	Department of the Interior Decommissioning Order for Lease OCS-G 06884 Viosca Knoll Block 780		
159	05/17/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02112 Eugene Island Block 315		
160	05/17/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02912 Eugene Island Block 329		
161	05/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03152 Eugene Island Block 136		
162	05/27/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01522 Ship Shoal Block 206		
163	05/27/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01523 Ship Shoal Block 207		
164	05/27/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01524 Ship Shoal Block 216		
165	06/01/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02757 High Island Block A382		
166	06/02/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01618 South Pass Block 89		
167	06/08/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01440 East Cameron Blocks 9 and 14		
168	06/08/2022	Department of the Interior Decommissioning Order for Lease OCS-G 13572 East Cameron Block 14		
169	06/08/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00438 Eugene Island Block 175		
170	06/09/2022	Department of the Interior Decommissioning Order for Lease OCS-G 13622 Eugene Island Block 173		
171	06/09/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03782 Eugene Island Block 174		
172	06/15/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01220 Eugene Island Block 158		
173	06/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02750 High Island Block A365		
174	06/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02754 High Island Block A376		
175	06/22/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01953 West Cameron Block 144		

DX #	Date	Description	Offered	Admitted
176	06/30/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05502 Eugene Island Block 211		
177	06/30/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05503 Eugene Island Block 212		
178	06/30/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05550 Ship Shoal Block 175		
179	07/13/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01182 South Marsh Island Block 11		
180	07/13/2022	Department of the Interior Decommissioning Order for Lease OCS-G 15050 West Cameron Block 33		
181	07/14/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03228 Galveston Block 180		
182	07/14/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03236 High Island Block 179		
183	07/20/2022	Department of the Interior Decommissioning Order for Lease OCS-G 15395 Main Pass Block 275		
184	07/20/2022	Department of the Interior Decommissioning Order for Lease OCS-G 09614 Ship Shoal Block 105		
185	07/20/2022	Department of the Interior Decommissioning Order for Lease OCS-G 12941 Ship Shoal Block 129		
186	07/22/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00081 West Cameron Block 110		
187	07/22/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00082 West Cameron Block 111		
188	07/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 10736 Eugene Island Block 187		
189	07/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00423 Eugene Island Block 189		
190	08/02/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05000 Matagorda Island Block 622		
191	08/02/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03088 Matagorda Island Block 623		
192	08/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02919 Ship Shoal Block 91		
193	08/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 33646 Ship Shoal Block 176		
194	08/16/2022	Department of the Interior Decommissioning Order for Lease OCS-G 05551 Ship Shoal Block 178		
195	08/23/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03251 West Cameron Block 34		
196	08/23/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02819 West Cameron Block 35		
197	08/23/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01860 West Cameron Block 35		
198	08/25/2022	Department of the Interior Decommissioning Order for Lease OCS-G 01955 Vermillion Block 265		
199	08/29/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03256 West Cameron Block 67		

DX #	Date	Description	Offered	Admitted
200	08/30/2022	Department of the Interior Decommissioning Order for Lease OCS-G 06069 Brazos Block 491		
201	08/31/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03332 Eugene Island Block 337		
202	08/31/2022	Department of the Interior Decommissioning Order for Lease OCS-G 03783 Eugene Island Block 353		
203	08/31/2022	Department of the Interior Decommissioning Order for Lease OCS-G 10752 Eugene Island Block 354		
204	09/06/2022	Department of the Interior Decommissioning Order for Lease OCS-G 25524 Galveston Block 210		
205	09/07/2022	Department of the Interior Decommissioning Order for Lease OCS-G 15312 Ship Shoal Block 354		
206	09/07/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02580 Vermillion Block 380		
207	09/08/2022	Department of the Interior Decommissioning Order for Lease OCS-G 16314 Vermillion Block 381		
208	09/12/2022	Department of the Interior Decommissioning Order for Lease OCS-G 20660 High Island Block 206		
209	10/26/2022	Department of the Interior Decommissioning Order for Lease OCS-G 34257 Vermillion Block 262		
210	11/10/2022	Department of the Interior Decommissioning Order for Lease OCS-G 00245 West Cameron Block 72		
211	11/28/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02825 West Cameron Block 65		
212	11/28/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02826 West Cameron Block 66		
213	12/02/2022	Department of the Interior Decommissioning Order for Lease OCS-G 02600 South Marsh Island Block 281		
214	07/07/2023	Department of the Interior Decommissioning Order for Lease OCS-G 12360 West Delta Block 103		
215	01/04/2023	Department of the Interior Decommissioning Order for Lease OCS-G 05612 South Timbalier Block 205		
216	01/04/2023	Department of the Interior Decommissioning Order for Lease OCS-G 05613 South Timbalier Block 206		
217	02/14/2023	Department of the Interior Decommissioning Order for Lease OCS-G 03068 Mustang Island Block A111		
218	03/01/2023	Department of the Interior Decommissioning Order for Lease OCS-G 02310 South Marsh Island Block 268		
219	03/20/2023	Department of the Interior Decommissioning Order for Lease OCS-G 00820 Ship Shoal Block 169		
220	04/03/2023	Department of the Interior Decommissioning Order for Lease OCS-G 02968 Mississippi Canyon Block 311		
221	04/17/2023	Department of the Interior Decommissioning Order for Lease OCS-G 01520 Ship Shoal Block 204		
222	04/17/2023	Department of the Interior Decommissioning Order for Lease OCS-G 24730 West Cameron Block 295		
223	05/01/2023	Department of the Interior Decommissioning Order for Lease OCS-G 00333 Ship Shoal Block 30		

DX #	Date	Description	Offered	Admitted
224	05/01/2023	Department of the Interior Decommissioning Order for Lease OCS-G 00334 Ship Shoal Block 31		
225	05/01/2023	Department of the Interior Decommissioning Order for Lease OCS-G 00335 Ship Shoal Block 32		
226	05/01/2023	Department of the Interior Decommissioning Order for Lease OCS-G 15288 Ship Shoal Block 194		
227	05/09/2023	Department of the Interior Decommissioning Order for Lease OCS-G 19843 West Delta Block 121		
228	05/09/2023	Department of the Interior Decommissioning Order for Lease OCS-G 13645 West Delta Block 122		

Dated: July 11, 2023

Respectfully submitted,

By: /s/ Geoffrey L. Harrison

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### Automated Certificate of eService

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Naela Olguin on behalf of Geoffrey Harrison

Bar No. 00785947

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Envelope ID: 77392356

Filing Code Description: No Fee Documents

Filing Description: Apache's Injunction Hearing Exhibit List

Status as of 7/11/2023 11:27 AM CST

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